

Exhibit 106

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

DONNA WOOD, individually and on behalf all
others similarly situated, et al.,

Plaintiff,

v.

MIKE BLOOMBERG 2020, INC.,

Defendant.

No. 20-cv-02489-LTS-GWG

DECLARATION OF ROBIN CEPPOS

I, Robin Ceppos, declare, based on personal knowledge and under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. I worked for Mike Bloomberg 2020, Inc. (the “Campaign”) as a Field Organizer from about January 31, 2020 to March 4, 2020.
2. I worked out of the Los Angeles and Pasadena, California Campaign offices.
3. The Campaign advertised that the Field Organizer position that would continue until the November 2020 Presidential Election, regardless of whether Michael Bloomberg remained in the race.
4. When I interviewed for the Field Organizer job, the person with whom I interviewed told me that, if I was hired, the Campaign guaranteed that I would continue to receive my salary and benefits through November, even if Michael Bloomberg was no longer a candidate for office.
5. Multiple times throughout my employment, the Campaign, including Jonathan Salvador [Deputy Organizing Director], represented that the Campaign would continue to pay my salary and benefits through November, as well as the salary and benefits of the other Field

Organizers. I relied on these promises in taking this job, even giving up a job at Hunton Andrews Kurth, LLP in Washington, D.C. where I was recently promoted. I relocated across the country to work for the Campaign based on the promises of a job, pay, and health benefits until November 2020.

6. Nevertheless, the Campaign terminated my employment on March 4, 2020 and terminated my salary as of March 31, 2020 and benefits as of March 31, 2020.

7. My typical schedule was Monday to Sunday from 9 a.m. to 8 p.m. or 9 p.m.

8. I usually worked about 75-84 hours per week. I was never paid any overtime wages when I worked more than 40 hours in a week or more than 8 hours in a day.

9. My main job duties as a Field Organizer were to call prospective voters to promote Michael Bloomberg's candidacy for President and to recruit volunteers for phone banking and canvassing efforts. The Campaign required that I meet certain metrics for the number of calls I made, which were many per week. I also met with voters and went door-to-door to encourage voters to vote for Michael Bloomberg.

10. All Field Organizers I observed performed these same duties, which the Campaign headquarters dictated.

11. As a Field Organizer, I had no authority to set other employees' schedules or my own, to direct the work of other employees or my own, or to hire, fire, or discipline other employees. All important decisions were made by a Regional Organizing Director, a state director, or by officials in the Campaign's national headquarters in New York, NY.

12. I also had no authority to make decisions of significance regarding the operations of the Campaign or my field office. I performed the job duties assigned by my Regional

Organizing Director, including calling the potential voters, canvassing neighborhoods, and/or visiting addresses assigned to me each day by the Regional Organizing Director.

13. My job duties did not require any specialized education, training, or experience. After I was hired, I attended an orientation at which I learned about the basic job responsibilities.

14. I used a script from the Campaign when making voter phone calls or speaking to voters in person.

15. I frequently received emails from officials in the Campaign's New York headquarters.

16. I also attended weekly conference calls with Campaign staffers across the country during which officials in the Campaign's New York headquarters, who led the calls, provided updates and directives.

17. The Campaign's New York headquarters also required me and other Field Organizers to participate in additional conference calls with Campaign staffers across the country. During these calls, Campaign officials in the New York headquarters provided information and guidance, including talking points for explaining the campaign's policy proposals to voters.

18. My monthly salary was \$6,000.


19. I also participated in the Campaign's health plan.

20. The Campaign did not pay me any overtime compensation for the hours I worked in excess of 40 in a workweek or 8 in a day.

21. I also know that other Field Organizers worked many overtime hours each week without receiving overtime pay because I worked with these Field Organizers and we had the

same schedule. There were more than 100 Field Organizers in the Los Angeles area and I witnessed many of them working overtime hours without pay while working with them.

Dated: 3/31/2020 _____

DocuSigned by:

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By: _____
Robin Ceppos